

Baker & Hostetler LLP

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Hearing Date: December 16, 2015
Hearing Time: 10:00 a.m. (EST)
Objections Due: December 1, 2015
Objection Time: 4:00 p.m. (EST)

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

**NOTICE OF HEARING ON TRUSTEE'S FIFTH OMNIBUS MOTION TO DISALLOW
CLAIMS AND OVERRULE OBJECTIONS OF CLAIMANTS WHO HAVE NO NET
EQUITY**

PLEASE TAKE NOTICE that on November 12, 2015, Irving H. Picard, trustee
("Trustee") for the substantively consolidated liquidation of Bernard L. Madoff Investment

Securities LLC (“BLMIS”) and the estate of Bernard L. Madoff (“Madoff”) (collectively, “Debtor”) in the above-captioned SIPA liquidation proceeding, by and through his undersigned counsel, filed the Trustee’s motion (the “Fifth Omnibus Motion”) seeking to have the Court disallow any and all claims and overrule objections filed by or on behalf of claimants (“Claimants”) that either withdrew more money from BLMIS than they deposited and are, in the parlance of this case, net winners, or that withdrew an equal amount to what was deposited and are, in the parlance of this case, net zeros. The Fifth Omnibus Motion will be heard before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on **December 16, 2015, at 10:00 a.m.**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that written objections to the Fifth Omnibus Motion must be filed with the Clerk of the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004 by no later than 4:00 p.m., on **December 1, 2015** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq. and (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington, DC 20006, Attn: Kevin H. Bell, Esq. and Nathanael Kelley, Esq. so as to be received on or before **December 1, 2015** (the “Response Deadline”). Any objection must specifically state the interest that the objecting party has in these proceedings and the basis of the objection to the Fifth Omnibus Motion.

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Fifth Omnibus Motion, the Trustee may, on or after the Response Deadline,

submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Fifth Omnibus Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York
November 12, 2015

Respectfully submitted,

/s/ David J. Sheehan

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